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### Engineering Statement

This Engineering Statement has been prepared on behalf of Triple Bogey, LLC, MCC Radio, LLC, and KDUX Acquisition, LLC (collectively, the "Counterpetitioners"), in support of reply comments filed in MB Docket No. 02-136.

On July 29, 2002, Mid-Columbia Broadcasting, Inc., First Broadcasting Company, L.P., and Saga Broadcasting Corp. (collectively, the "Joint Parties") filed a proposal by which:

- 1) Station KMCQ Channel 283C The Dalles, Oregon, would be downgraded to Channel 283C2 and be reallocated from The Dalles to Kent, Washington;
- 2) Channel 281C would be substituted for Channel 282C for station KAFE at Bellingham, Washington;
- 3) Channel 288A would be substituted for Channel 280A for station KLLM at Forks, Washington;
- 4) Channel 283C1 would be allotted at Moro, Oregon, as a new "drop-in";
- 5) Channel 261C2 would be allotted at Arlington, Oregon, as a new "drop-in", and;
- 6) Channel 226A would be allotted at Trout Lake, Washington, as a new "drop-in".

Also on July 29, 2002, the Counterpetitioners filed a proposal by which:

- 1) Station KDUX Channel 284C2 Aberdeen, Washington, would be modified to Channel 283C2 and be reallocated from Aberdeen to Shoreline, Washington;
- 2) Channel 281C would be substituted for Channel 282C for station KAFE at Bellingham, Washington;

- 3) Channel 240A would be substituted for Channel 280A for station KLLM at Forks, Washington;
- 4) Channel 284C2 would be substituted for Channel 237C3 for station KXXK at Hoquiam, Washington;
- 5) Channel 237C3 would be allotted at Aberdeen, Washington, as a new "drop-in";
- 6) Channel 226A would be allotted at Trout Lake, Washington, as a new "drop-in";
- 7) Channel 261C2 would be allotted at Arlington, Oregon, as a new "drop-in";
- 8) Channel 285A would be allotted at Fossil, Oregon, as a new "drop-in", and;
- 9) Channel 300A would be allotted at Moro, Oregon, as a new "drop-in".

### **The Joint Parties' Proposal**

The Moro, Arlington, and Trout Lake allotments proposed by the Joint Parties are intended to fill certain **loss** areas created by the removal of Channel 283C from The Dalles. Station KMCQ, which operates on that channel, presently provides aural service to a very broad area, including some areas in which it is one of only two aural services, and some areas in which it is the only aural service.

In light of the Commission's recent decision in *Pacific Broadcasting of Missouri, LLC*, FCC 03-18 (released February 11, 2003), a detailed analysis has been made to identify the areas which would lose their first or **second** aural service if Channel 283C were to be allotted away from The Dalles.<sup>1</sup> In the context of this analysis, the proposed "backfill" allotments at Moro, Arlington, and Trout Lake have been ignored since these allotments would not generate service to the public until they are auctioned at some future date. FM broadcast auctions have been postponed indefinitely,

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<sup>1</sup>In determining reception service provided by FM stations, the area of service circumscribed by the station's 1.0 mV/m signal contour was considered, assuming 1) actual facilities for non-commercial stations operating on reserved channels, 2) maximum facilities for the class of station for stations (other than Class C stations) operating on non-reserved channels, and 3) minimum or existing Class C facilities, whichever is greater, for Class C stations. For clear channel Class A AM stations, the service area was defined by the station's 0.5 mV/m groundwave contour, based on its licensed facilities. For all other classes of full-time AM stations, reception service was defined as that service received within a station's nighttime interference-free contour. See *Meeker and Craig*, Colorado, 15 FCC Rcd 23858 (2000), *Stamps and Fouke*, Arkansas, 14 FCC Rcd 10533 (1999), *Silverton and Bayfield*, Colorado, 14 FCC Rcd 4071 (1999), *Malvern and Bryant*, Arkansas, 13 FCC Rcd 8426 (1998), and others.

All population counts have been performed using the block centroid methodology.

and the Commission has noted that "the ultimate licensing of a backfill through our auction procedures is both an uncertain and time-consuming process, especially during the current hiatus in broadcast auctions." See *Pacific Broadcasting of Missouri, LLC*, at Paragraph 14.

Each of the stations listed on the following page provides service to a portion of the Channel 283C **loss** area at The Dalles.

KBVM-FM	Channel 202C2	Portland	
KLVP-FM	Channel 204C1	Cherryville	
KMHD-FM	Channel 206C1	Gresham	(CP facility used)
KFAE-FM	Channel 206C	Richland	
KBNO-FM	Channel 207A	White Salmon	
KPFR-FM	Channel 208C1	Pine Grove	(CP)
KSOH-FM	Channel 208C2	Wapato	
KBPS-FM	Channel 210C2	Portland	(CP facility used)
KQHR-FM	Channel 211A	Hood River	
KZRI-FM	Channel 212C3	Welches	
KNWY-FM	Channel 212C3	Yakima	
KBOO-FM	Channel 214C1	Portland	
KYPL-FM	Channel 216C1	Yakima	(CP facility used. license application is on file)
KOPB-FM	Channel 218C0	Portland	(CP facility used. license application is on file)
KWSO-FM	Channel 220C2	Warm Springs	
KDNA-FM	Channel 220C1	Yakima	
KGON-FM	Channel 222C	Portland	
KMSW-FM	Channel 224C3	The Dalles	
KDBL-FM	Channel 225C2	Toppenish	
KPDQ-FM	Channel 229C	Portland	
KATS-FM	Channel 233C1	Yakima	
KNRK-FM	Channel 234C2	Camas	
KIOK-FM	Channel 235C	Richland	
KMJZ-FM	Channel 236C1	Prineville	
KXJM-FM	Channel 238C	Portland	
KXXO-FM	Channel 241C	Olympia	
KWLZ-FM	Channel 243C	Warm Springs	
KZTA-FM	Channel 245C2	Naches	(CP facility used)
KKSN-FM	Channel 246C	Portland	
KACI-FM	Channel 249C2	The Dalles	
KUPL-FM	Channel 254C1	Portland	
KLES-FM	Channel 254C2	Mabton	(CP facility used)
KQSN-FM	Channel 257A	Naches	
KWJJ-FM	Channel 258C1	Portland	
KHHK-FM	Channel 259C3	Yakima	
KKRZ-FM	Channel 262C	Portland	
KARY-FM	Channel 265C2	Grandview	
KUFO-FM	Channel 266C	Portland	
KMNA-FM	Channel 269C3	Prmsser	
KINK-FM	Channel 270C	Portland	
KYYT-FM	Channel 272C2	Goldendale	
KORD-FM	Channel 274C	Richland	
KQBE-FM	Channel 276C2	Ellensburg	
KKCW-FM	Channel 277C	Beaverton	
KXPC-FM	Channel 279C	Lebanon	(CP facility used)
KFIS-FM	Channel 281C2	Scappoose	
KXDD-FM	Channel 281C1	Yakim	
KRSK-FM	Channel 286C	Salem/Molalla	
KONA-FM	Channel 287C	Kennewick	
KCGB-FM	Channel 288A	Hood River	
KRSE-FM	Channel 289C1	Yakima	
KRVO-FM	Channel 290C1	Vancouver	
KEGX-FM	Channel 293C	Richland	
KLTH-FM	Channel 294C	Lake Oswego	
KFFM-FM	Channel 297C	Yakima	
KVMX-FM	Channel 298C1	Banks	
KOMO-AM	1000 kHz	Seattle	(Class A, 0.5 mV/m contour used)
KIHR-AM	1340 kHz	Hood River	(NIF = 26.4 mV/m)
KLCK-AM	1400 kHz	Goldendale	(NIF = 25.3 mV/m)
KODL-AM	1440 kHz	The Dalles	(NIF = 9.4 mV/m)
KYNR-AM	1490 kHz	Toppenish	(NIF = 25.8 mV/m)

For the purposes of this analysis, the Joint Parties' proposed allotments at Moro, Arlington, and Trout Lake have been ignored. There are also two existing vacant allotments in the vicinity of the Channel 283C loss area: Channel 288A at Condon, Oregon, and Channel 268C3 at The Dalles, Oregon. While these allotments have already been approved by the Commission in earlier rulemaking proceedings, they sit unused and will be subject to auction at some future unspecified date. For the sake of a complete record, analysis of the Channel 283C loss area has been made both excluding and including the vacant Condon Channel 288A and The Dalles Channel 268C3 allotments.

The results of this analysis show that the removal of Channel 283C from The Dalles will result in the creation of white and gray areas.

Scenario #1: The following vacant allotments are ignored: *Moro* Channel 283C1, Arlington Channel 261C2, Trout Lake Channel 226A, Condon Channel 228A, and The Dalles Channel 268C3

1,799 persons in a 2,012 km<sup>2</sup> area would lose their only aural service (including the entire population of the City of Arlington and the City of Condon), and 1,836 persons in a 4,453 km<sup>2</sup> area would lose their second aural service (including the entire population of the City of Maupin)

Scenario #2: The following vacant allotments are ignored: *Moro* Channel 283C1, Arlington Channel 261C2, and Trout Lake Channel 226A

791 persons in a 1,016 km<sup>2</sup> area would lose their only aural service (including the entire population of the City of Arlington), and 2,583 persons in a 4,376 km<sup>2</sup> area would lose their second aural service (including the entire population of the City of Condon and the City of Maupin)

It should be noted that these same white and gray area figures also apply to the original proposal by Mid-Columbia Broadcasting, Inc., and First Broadcasting Company, L.P., to reallocate KMCQ Channel 283C The Dalles to Covington, Washington, on Channel 283C3. There is no overlap of

the KMCQ Channel 283C The Dalles 60 dBu service area with either the Covington 283C3 60 dBu service area or the Kent 283C2 60 dBu service area.

### **The Counterpetitioners' Proposal**

This same analysis has been repeated for the Counterpetitioners' proposal to remove Channel 284C2 from Aberdeen. For the purposes of this analysis, the Counterpetitioners' proposed allotment of Channel 237C3 at Aberdeen\* has been ignored, as have the existing vacant allotments of Channel 228A at Ocean Shores, Channel 267A at Westport, Channel 282A at Chehalis, and Channel 300A at South Bend.<sup>3</sup>

None of the Counterpetitioners' Channel 284C2 loss area will be deprived of its first or second aural service. As is depicted on the attached map exhibit, stations KIRO-AM and KFMY-FM would each continue to provide service to 100% of the loss area. This is true both for the licensed KFMY-FM facility (Channel 249C1 at Raymond), and for presumed KFMY-FM operation at its approved Channel 249C1 allotment site at Oakville.

Following is a list of stations providing service to all or portions of the Channel 284C2 loss area:

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<sup>2</sup>It should be noted that the proposed Aberdeen Channel 237C3 allotment is not designed to ensure the retention of first local service at Aberdeen. Aberdeen will continue to be served by AM stations KXRO on 1320 kHz and KBKW on 1450 kHz.

<sup>3</sup>The Counterpetitioners' proposals to create new vacant allotments at Moro, Arlington, Trout Lake, and Fossil would not impact any loss areas. The service areas of these allotments would create only gain areas.

KAOS-FM	Channel 207A	Olympia	
KACS-FM	Channel 213A	Chehalis	(CP facility used)
KVTI-FM	Channel 215C1	Tacoma	
KMUN-FM	Channel 220C2	Astoria	
KA <del>ST</del> -FM	Channel 225C1	Astoria'	
KAQX-FM	Channel 232A	Long Beach'	
KRXY-FM	Channel 233A	Shelton	
KITI-FM	Channel 236A	Winlock	
KXXO-FM	Channel 241C	Olympia	
KGY-FM	Channel 245C3	McCleary	
KFMY-FM	Channel 249C1	Raymond	Oakville
KAYO-FM	Channel 257C1	Elma	
KSWW-FM	Channel 271C2	Montesano	(CP facility used)
KMNT-FM	Channel 275C	Centralia	
KVAS-FM	Channel 280C3	Ilwaco	
KJET-FM	Channel 289C2	Swth Bend	
KRQT-FM	Channel 296C3	Castle Rock	
KIRO-AM	710 kHz	Seattle	(Class A, 0.5 mV/m contour used)
KOMO-AM	1000 kHz	Seattle	(Class A, 0.5 mV/m contour used)
KXRO-AM	1320 kHz	Aberdeen	(NIF = 6.8 mV/m)
KBKW-AM	1450 kHz	Aberdeen	(NIF = 18.8 mV/m)
KWOK-AM	1490 kHz	Hoquiam	(NIF = 24.8 mV/m)

## Conclusions

Approval of the Joint Parties' proposal would remove the only aural service from **1,799** persons in the KMCQ Channel 283C loss area, depriving those persons of their only radio reception service. Another 1,836 persons would lose their second aural service.

Approval of the Counterpetitioners' proposal would not deprive any area or population of first or second aural service.

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<sup>4</sup> Under a proposal filed by New Northwest Broadcasters, LLC. also a part of MB Docket No. 02-136, station KAST would be reallocated to Gladstone, Oregon, on Channel 226C3. This proposal, if adopted, would have no effect on the white and gray area analysis described in this Engineering Statement.

<sup>5</sup> Under a proposal filed by New Northwest Broadcasters, LLC. also a part of MB Docket No. 02-136, Channel 224A would be substituted for the Channel 232A currently in use by KAQX, at the present KAQX coordinates. This proposal, if adopted, would have no effect on the white and gray area analysis described in this Engineering Statement.

**Statement of Engineer**

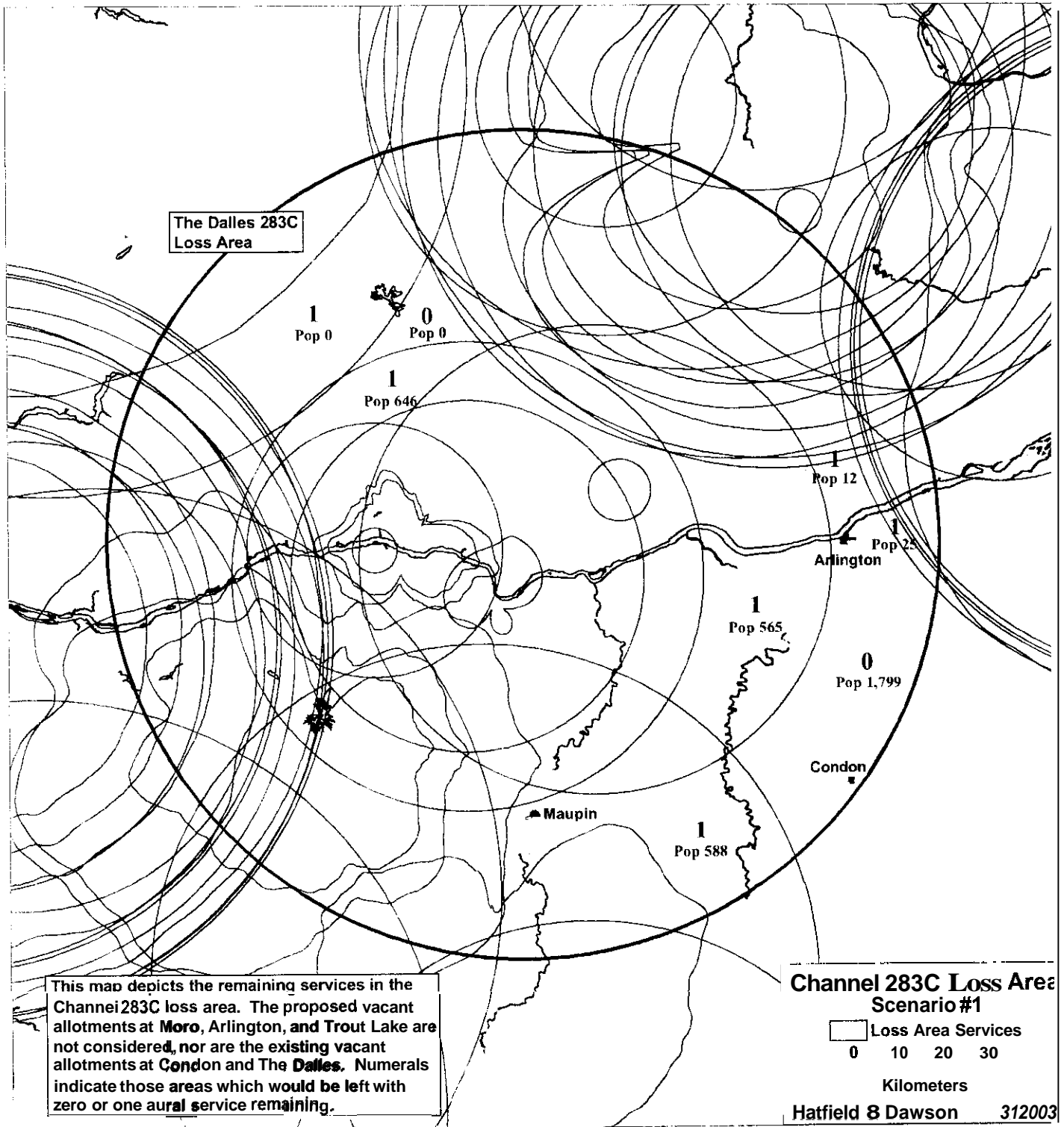
This Engineering Statement has been prepared by Erik C. Swanson, EIT, under my direct supervision. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

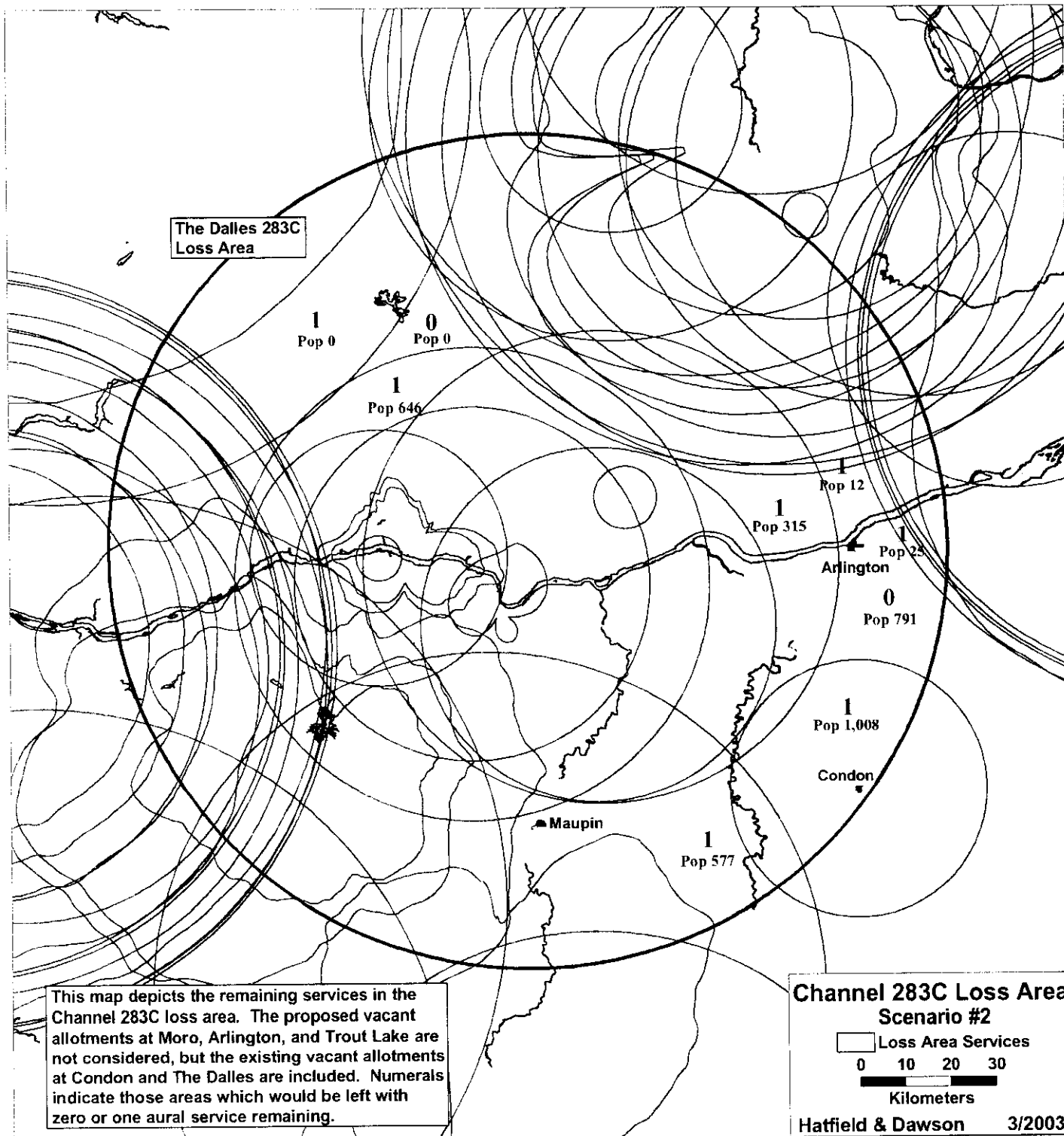
Signed this 21<sup>st</sup> day of March, 2003.



Benjamin F. Dawson III, P.E.

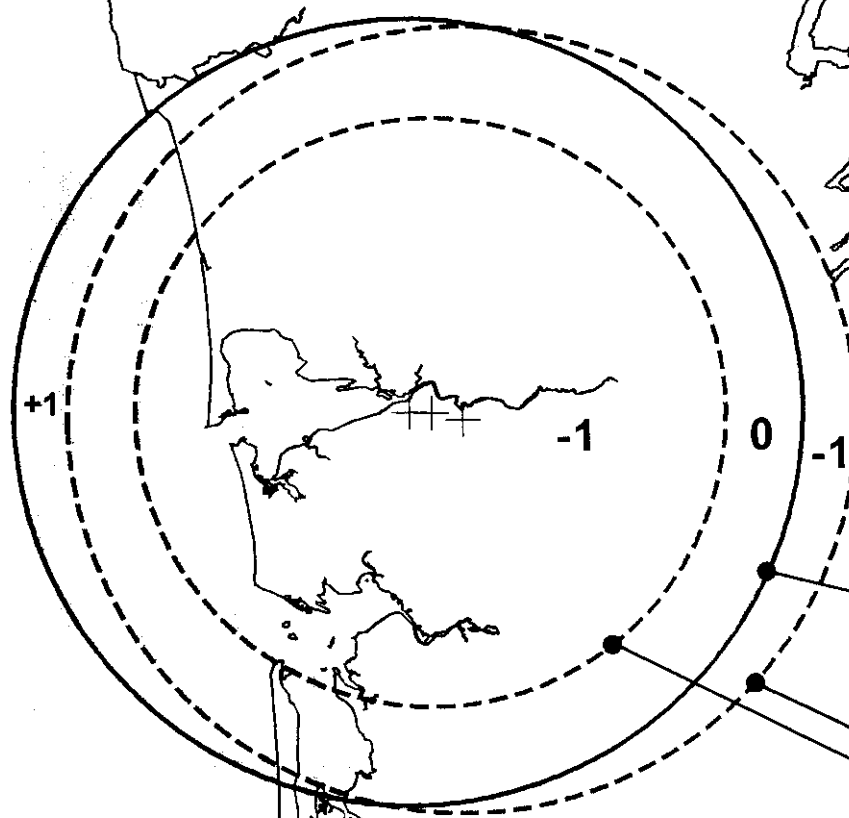






This map depicts the remaining services in the Channel 283C loss area. The proposed vacant allotments at Moro, Arlington, and Trout Lake are not considered, but the existing vacant allotments at Condon and The Dalles are included. Numerals indicate those areas which would be left with zero or one aural service remaining.

Numerals indicate number of services gained or lost as a result of the proposed reallocation plan, excluding the proposed Aberdeen Channel 237C3 allotment.



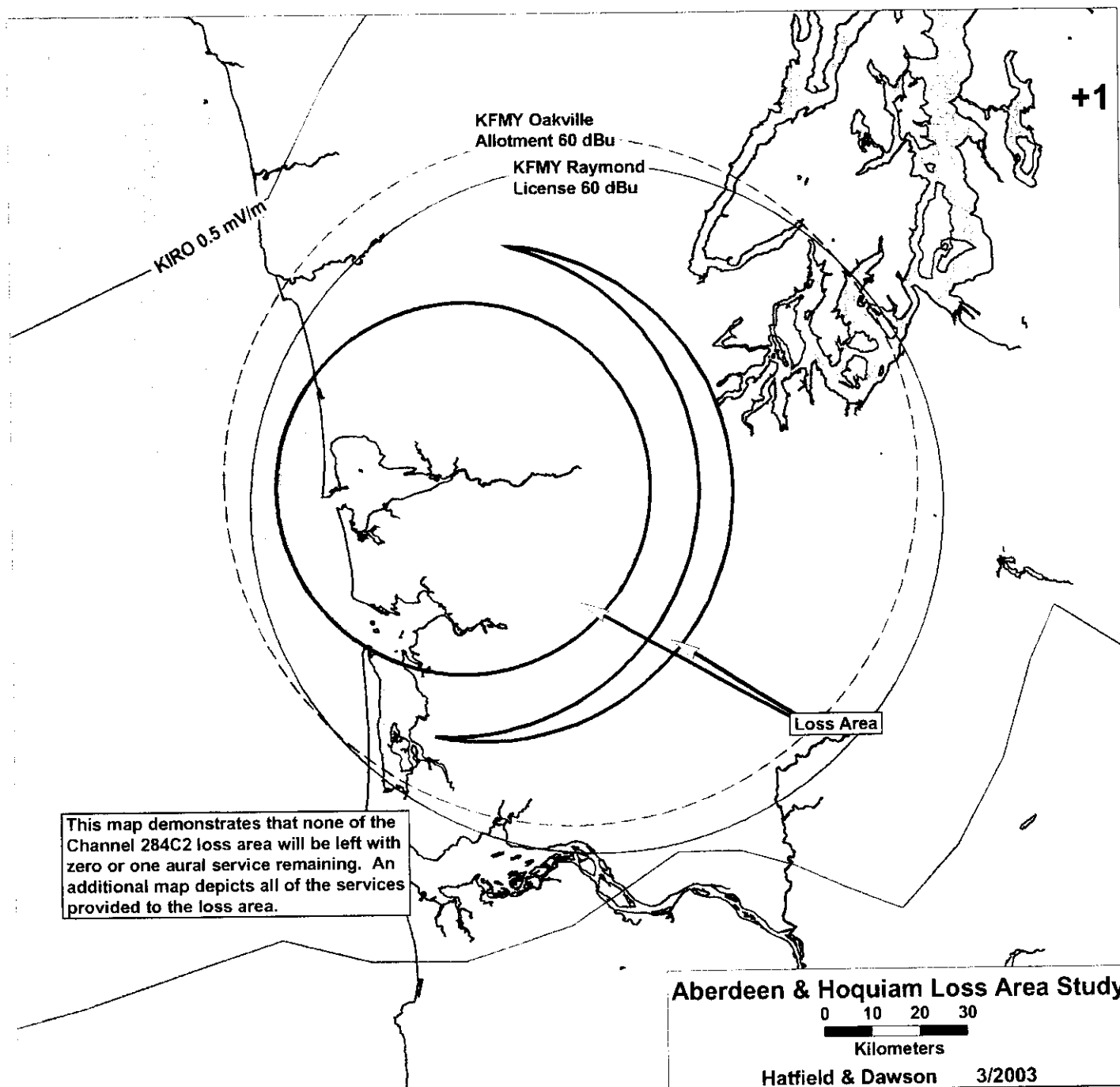
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Hoquiam 284C2  
60 dBu Contour

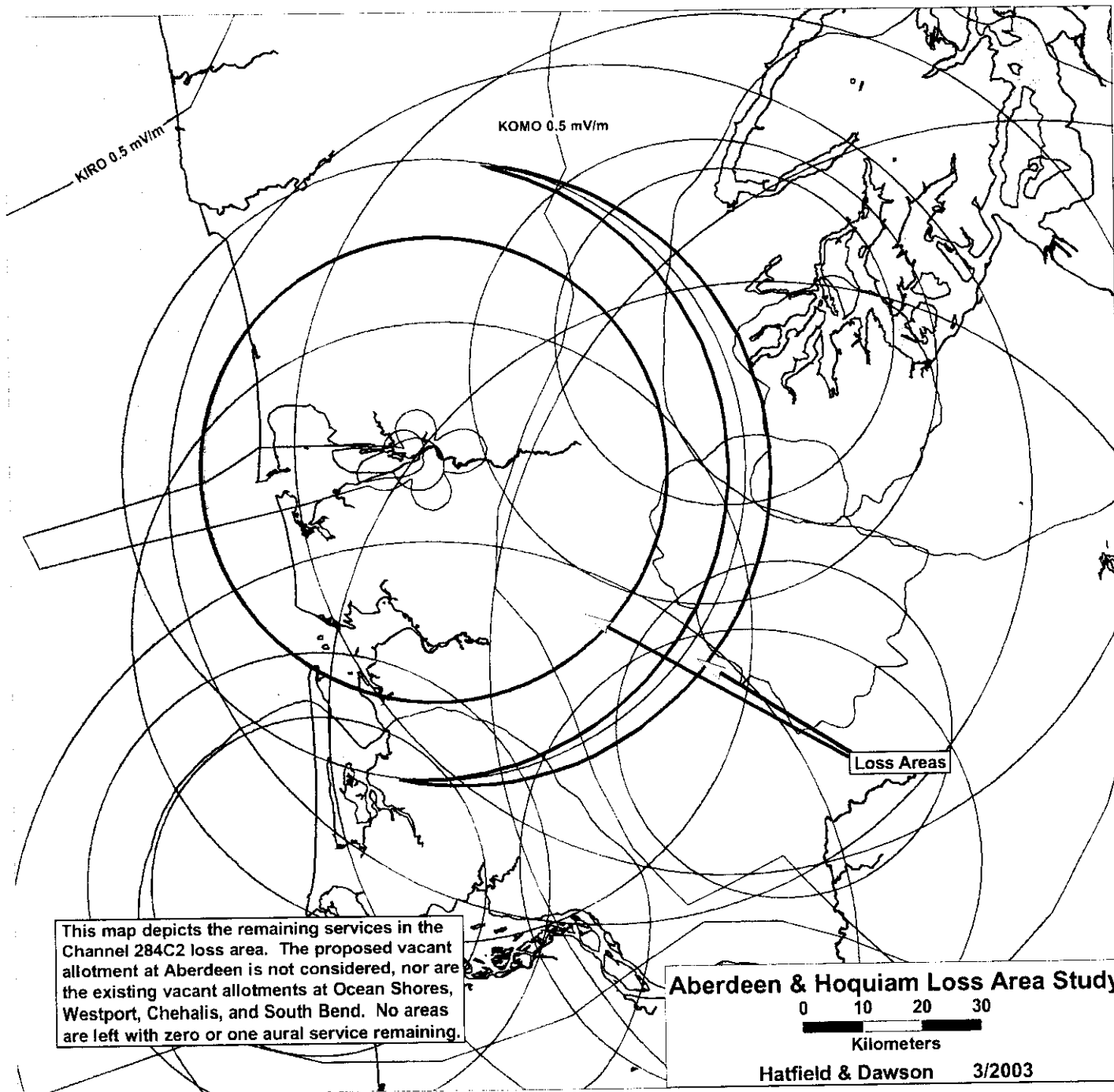
Dashes = Existing  
Aberdeen 284C2  
Hoquiam 237C3  
60 dBu Contours

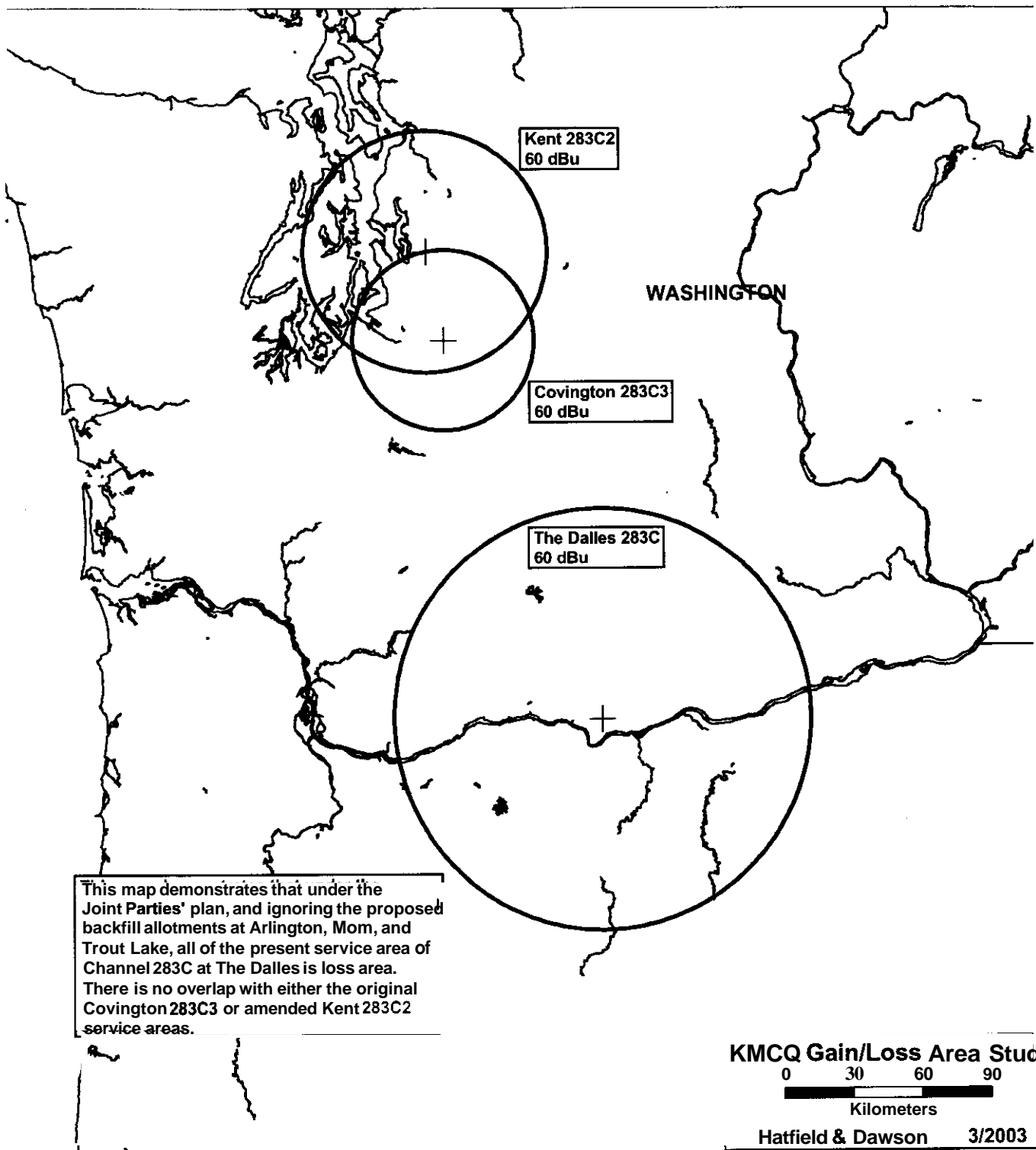
### Aberdeen & Hoquiam Gain/Loss Study

0 10 20 30  
Kilometers

Hatfield & Dawson 3/2003







## CERTIFICATE OF SERVICE

I, Janice M. Rosnick, do hereby certify that I have on this 25<sup>TH</sup> day of March, 2003, caused to be hand delivered or mailed via First Class Mail, postage prepaid, copies of the foregoing REPLY COMMENTS to the following:

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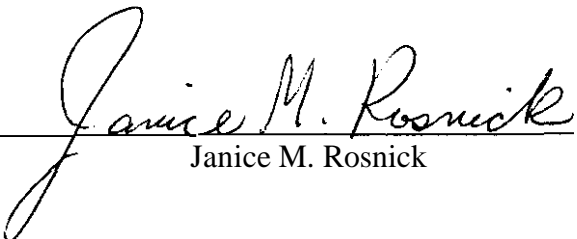
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